

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
BEFORE MAGISTRATE JACQUELINE SCOTT CORLEY

WAYMO, LLC)
)
Plaintiff,)
)
vs.) No. C 17-00939 WHA (JCS)
)
UBER TECHNOLOGIES, LLC., OTTO)
TRUCKING, LLC, and OTTOMOTTO, LLC,)
) San Francisco, California
Defendants.) Thursday
) May 25, 2017
) 10:00 a.m.

TRANSCRIPT OF PROCEEDINGS

APPEARANCES:

For Plaintiff: QUINN, EMANUEL, URQUHART, OLIVER
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(APPEARANCES CONTINUED ON FOLLOWING PAGE)

Reported By: Debra L. Pas, CSR 11916, CRR, RMR, RPR
Official Reporter - US District Court
Computerized Transcription By Eclipse

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1 product. And I just want to make that clear.

2 **THE COURT:** Maybe we should address that for a
3 moment, right?

4 Why is that -- I guess their argument that it's work
5 product is because they chose which documents to put in the
6 report. Of course, their response would be: Fine, then just
7 produce all the documents that you have.

8 By the way, before I forget, with respect to that
9 discovery letter, the expedited discovery can include
10 third-party discovery. If you want to use your limited numbers
11 on that, then so be it. I discussed that with Judge Alsup.

12 **MR. VERHOEVEN:** If I might say, we just heard
13 repeatedly stated that Stroz is their agent and they have --

14 **THE COURT:** Don't -- don't make an anticipatory
15 argument to me before it's in front of me. Maybe Mr. Cooper
16 can take care of it.

17 **MR. VERHOEVEN:** Okay.

18 **THE COURT:** But I guess one -- one cute response, I
19 guess, but the response they've made is: Fine, we don't want
20 their work product. We don't know -- don't care how they chose
21 what to put in there. Just give it all to us.

22 **MS. DUNN:** The law doesn't work that way. The law
23 says that the judgments of selecting out of thousands of
24 documents what to put as an attachment to a report that you're
25 preparing for lawyers in anticipation of litigation, that that

CERTIFICATE OF OFFICIAL REPORTER

I certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Debra L. Pas

Debra L. Pas, CSR 11916, CRR, RMR, RPR

Friday, May 26, 2017